

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY	)	
KENTUCKY, INC. FOR 1) AN ADJUSTMENT OF	)	
THE ELECTRIC RATES; 2) APPROVAL OF NEW	)	CASE NO.
TARIFFS; 3) APPROVAL OF ACCOUNTING	)	2019-00271
PRACTICES TO ESTABLISH REGULATORY	)	
ASSETS AND LIABILITIES; AND 4) ALL OTHER	)	
REQUIRED APPROVALS AND RELIEF	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO KROGER COMPANY

The Kroger Company (Kroger), pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of the following information. The information requested herein is due on January 17, 2020. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Kroger shall make timely amendment to any prior response if Kroger obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Kroger fails or refuses to furnish all or part of the requested information, Kroger shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Kroger shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Justin D. Beiber (Beiber Testimony), page 6, line 1.

a. Explain what constitutes a narrow range for peaks to fall within.

b. Explain whether this range only applies to Duke Energy Kentucky, Inc., (Duke Kentucky), and whether it is generally used for all utilities.

2. Refer to the Beiber Testimony, page 10, lines 12–23, and continuing onto page 11, lines 1–9. Confirm that the proposed revenue allocation removes Duke Kentucky’s proposed 5 percent subsidy reduction in favor of a subsidy reduction based upon a pro rata basis proportional to the current subsidy.

3. Refer to the Beiber Testimony, Exhibit JDB-1. Provide in Excel spreadsheet format with all formulas unhidden and all columns and rows accessible.

4. In Duke Kentucky's cost-of-service study, Mr. Ziolkowski applies the minimum system methodology for the allocation of poles, overhead conductors, underground conductors, transformers between customers, and demand-related costs. Explain whether Kroger supports the use of the minimum system.

*For*   
Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED JAN 03 2020

cc: Parties of Record

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